

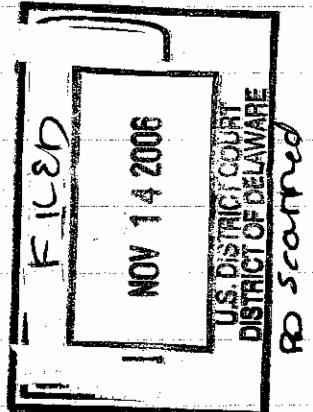
04-1205-SLR

NOVEMBER 7-2006

On the united States District Court for the
District Court for the District of Wilmington,
Delaware Lock Box 13
844 King Street
Wilmington, Delaware 19801-3570

PETITION TO COURT TO OVERTUR
SUMMARY OF JUDGMENT OF
CIVIL SUIT:

TO: THE HONORABLE JUDGE SUE L. ROBINSON,
MR. PETER T. DALLED CLERK OF U.S. D.C.



The petitioners MR. Jeffrey alongs Simms, Have Supportive
Cases in the above matter; the Supreme Court
Have Suggested that when a single judge, rather than
a legislature, declares a particular Sanction Civil
or Criminal, a lesser degree of deference is required.

Bagwell, 512 U.S. at 831-832; SEE U.S. V. Winter, 70
F.3d 655, 660 (1ST CIR 1995) (Sanction neither clearly
Civil nor Criminal; therefore, Sanction Vacated and Case
Remanded for Clarification of Nature of Sanction By
District Court) Gregory V. Dept. of 96 F.3d 1, 35 (3d Cir
1990) ALSO SEE BUFFINGTON V. BALTIMORE COUNTY, 913 F.2d
113, 133 (4th Cir 1990)

1 of 2 petitions MR. Jeffrey alongs Simms # 198625 unit 17
Delaware Correctional Center 1121 paddock Rd Smyrna, Del 19977

MR. JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

04-1205-SLR

Petition To overturn Summary judgment
in civil Suite

() NOVEMBER 9 2006

HONORABLE CHIEF JUDGE SUE L. ROBINSON,
CLERK OF U.S.D.C. MR. PETER T. DALLEO,
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WILMINGTON,
DELAWARE CLOCK BOX 18
844 KING STREET (04-1205-SLR)
WILMINGTON, DELAWARE 19801-3570

HONORABLE JUDGE RICHARD F. STOKES,
IN THE SUPERIOR COURT OF SUSSEX
COUNTY DELAWARE (0207014771)
JUDGES CHAMBERS
P.O. BOX 746
GEORGETOWN, DELAWARE 19947

(SUSSEX COUNTY)
PUBLIC DEFENDERS OFFICE
12 E. PINE STREET
GEORGETOWN, DELAWARE 19947

MS. DONNA REBURTH BURNS, M.D.
CHIEF DOCTOR, DELAWARE DEPARTMENT OF
CORRECTION P.O. BOX 500 GEORGETOWN,
DELAWARE 19947
MR. HARRY M. FREEMAN, SURGERY-ORTHOPEDIC
808 MIDDLE ROAD
SEAFORD, DELAWARE 19973
MAJOR R.L. HUGES, LT.COL. THOMAS F. MACLEISH
COL.L. ARRON CHAFFINCH
DELAWARE STATE POLICE 1441 N. DUPONT HWY,
DOVER, DELAWARE 19901;
ATTORNEY GENERAL FOR THE STATE OF DELAWARE
820 N. FRENCH STREET WILMINGTON,
DELAWARE 19801 (MR. RALPH K. DURSTEIN 111)
(CARL DAN BURGE)

MR. Kendall Simms

43 DELAWARE AVE. #104
HURLOCK, MARYLAND 21643

ms. marie Simms

103 ROUTZAHN LANE
FEDERALSBURG, MARYLAND

ms. Dannora Holden 21632
311 8TH STREET
LAUREL, DELAWARE
19856.

(302-875-7085)

()

(410-754-7060)

(407-880-2604)

(410-228-7727)

(JA' RONDA, KEYUSHA)

()

(DANNORA HOLDEN)

1 of 2 To: the Honorable Judge Sue L. Robinson.
please be advised because of the civil Suite
The correctional Center have place me in adverse
Substantive Consequence, please consider relocation
of the petitioner
your respond will be most appreciative

petitioner, Jeffrey A Simms #198625

Delaware correction center unit 17
1181 Paddock Rd Smyrna, Delaware 19977

DELAWARE DEPARTMENT OF CORRECTIONS NOV. 9-2006
REQUEST FOR MEDICAL/DENTAL SICK CALL SERVICES
FACILITY: DELAWARE CORRECTIONAL CENTER
This request is for (circle one): **MEDICAL DENTAL MENTAL HEALTH**

Jeffrey X Simms

Name (Print)

6-28-64

Date of Birth

SHU-17 D-L-10

Housing Location

198625

SBI Number

11-9-2006

Date Submitted

Complaint (What type of problem are you having)? fracture Right Hand
left and Right Knee painful and swollen
Due to continual cold deprivation Cell
No Heat NO medication NEED motrixy 200mg

Jeffrey Simms

Inmate Signature

11-9-2006

Date

The below area is for medical use only. Please do not write any further.

S:

O: Temp: _____ Pulse: _____ Resp: _____ B/P: _____ WT: _____

A:

P:

E:

Provider Signature & Title

Date & Time

IM JEFFREY Simms
SBI# 198625 UNIT 17
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

WILMINGTON DE 197

13 NOV 2005 PM 2 T



in the United States District Court for
the District of Wilmington,
Honorable Chief Judge SETH. ROBINSON
Act of U.S. S. C. Mr. Peter T. Dallas
box 8018 844 King STREET
Wilmington, Delaware
19801-3570

1580448570